

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

VALERIE JACKSON,
Plaintiff,

vs.

LUPE VALDEZ, et al.,
Defendants.

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**CIVIL ACTION
NO. 3:18-CV-2935-S**

**DEFENDANTS' UNOPPOSED MOTION TO WITHDRAW
AND SUBSTITUTE COUNSEL**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Defendants Lupe Valdez, Marian Brown, Lizyamma Samuel, Samuel Joseph, Brenda Devers, Lola Pugh, Selma Littles, Pamela Nixon and Dallas County, Texas, ("the Defendants") and move the Court to allow Tammy J. Ardolf, Assistant District Attorney, to withdraw as attorney of record for said Defendants and to substitute John Butrus, Assistant District Attorney as the lead attorney of record. In support thereof, Defendants would show the Court as follows:

I.

Effective May 24, 2019, the undersigned counsel will no longer be employed as an Assistant District Attorney of Dallas County, Texas. Accordingly, she cannot continue to participate in this litigation.

II.

John Butrus, Assistant District Attorney, who is a member in good standing of the bar of this Court will assume representation of Defendants in this suit. Mr. Butrus's contact information is as follows:

John Butrus
Assistant District Attorney
Texas Bar No. 03537330
John.Butrus@DallasCounty.org
Federal Litigation Division
Frank Crowley Courts Building,
133 N. Riverfront Blvd., L.B. 19
Dallas, TX 75207-4399
(214) 653-3691
(214) 653-2899 (FAX)

Granting this motion will not prejudice Plaintiff or unduly delay any proceeding in this action. Moreover, as detailed in the Certificate of Conference, Plaintiff is not opposed to this substitution of counsel.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendants pray the Court will enter an Order removing Tammy J. Ardolf, Assistant District Attorney, as attorney of record and listing John Butrus as lead counsel of record for the Defendant in this suit.

Respectfully submitted,

JOHN CREUZOT
DISTRICT ATTORNEY

/s/ Tammy Ardolf

TAMMY ARDOLF
ASSISTANT DISTRICT ATTORNEY
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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

I, the undersigned counsel, state I conferred via email with Plaintiff's counsel Scott Palmer via email on May 7, 2019. Plaintiff is not opposed to the relief requested in this motion.

/s/ Tammy Ardolf
TAMMY ARDOLF

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that I electronically transmitted the attached document to the Clerk of the Court for the United States District Court for the Northern District of Texas using the CM/ECF electronic case filing system of the Court.

/s/ Tammy Ardolf
TAMMY ARDOLF